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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**BAKER & HOSTETLER'S  
SUPPLEMENT OF ITS FINAL FEE  
APPLICATION FOR SERVICES  
RENDERED AND EXPENSES  
INCURRED FROM APRIL 1, 2023  
THROUGH APRIL 30, 2024**

Hearing Date: October 2, 2024  
Hearing Time: 9:30 a.m.

Baker & Hostetler LLP ("B&H" or "Applicant"), regulatory counsel to Cash Cloud, Inc., dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-referenced chapter 11 bankruptcy case (the "Chapter 11 Case"), respectfully submits the instant *Supplement* (the "Supplement") in further support of its *Final Fee Application for Services Rendered and Expenses Incurred for the Period from April 1, 2023 through April 30, 2024* [ECF No. 1764] (the "Final Fee Application"), pursuant to the Retention Order<sup>1</sup> and the Interim Compensation Procedures Order.

In support of the Final Fee Application, B&H respectfully represents as follows:

<sup>1</sup> All defined terms used herein shall be attributed to the definitions used in the Final Fee Application if not otherwise defined herein.

## I. THE FINAL FEE APPLICATION

1. On August 30, 2024, B&H filed its Final Fee Application seeking an order allowing payment of the full amount of fees and expenses incurred during the period from April 1, 2023 through April 30, 2024 (the “Final Fee Period”) in the sum of \$202,183.50 in fees and \$511.68 in expenses, or a total of \$202,695.18 (the “Requested Compensation”). Of the Requested Compensation, B&H received payment of \$50,000.00, with a remaining balance of \$152,695.18. B&H submitted its Monthly Fee Statements in this case. No objections to the Monthly Fee Statements were filed.

2. On September 17, 2024, the undersigned was contacted by the Office of the United States Trustee (the “UST”) regarding the Final Fee Application. The UST asserted its position that certain of B&H’s fee entries, as more fully discussed below, were either descriptively vague or constituted “block billing”.

3. In the interest of resolving the concerns raised by the UST, and to obviate the need for motion practice before this Court, B&H hereby files the instant Supplement.

4. As an initial matter, with regard to certain time entries identified by the UST as constituting “block billing”, B&H agrees to voluntarily reduce its fee request for those entries in the sums identified by the UST, which sum aggregates to \$774.00. Those entries are:

LEDES Row	Date	Timekeeper	Narrative	Objection Amount
16	4/26/23	R. Musiala	Discuss regulatory issues with C McAlary and B Axelrod, review related documentation.	\$162.00
23	4/28/23	R. Musiala	Review FL OFR documentation, discuss with C McAlary and B Axelrod.	\$162.00
65	5/9/23	R. Musiala	Review Florida Office of Financial Regulation materials, discuss with J. Forman and V. Reynolds	\$180.00
111	5/18/23	R. Musiala	Review CKDL Credit LLC contract dispute issues, discuss with A. Noll.	\$108.00
178	6/27/23	R. Musiala	Conduct legal research regarding customer refunds, discuss with B Axelrod and J Tanner.	\$162.00
<b>TOTAL</b>				<b>\$774.00</b>

5. With respect to the time entries identified by the UST as “vague”, B&H submits this Supplement for the purpose of providing the necessary detail and information in connection with same.

- Regarding the time entry in LEDES Row 77 recording time entered on 5/11/23 by Jonathan Forman, with narrative reading “Emails with Mr. Musiala, Ms. Reynolds, and Mr. Lamb regarding research”; the narrative should be revised to read **“Emails with Mr. Musiala, Ms. Reynolds, and Mr. Lamb regarding research in support of Coin Cloud's Florida Office of Financial Regulation response.”**
- Regarding the time entry in LEDES Row 78 recording time entered on 5/11/23 by Veronica Reynolds, with narrative reading “Confer with M. Sabella regarding bankruptcy proceedings”; the narrative should be revised to read **“Confer with M. Sabella regarding letter responding to Florida state on regulatory matter.”**
- Regarding the time entry in LEDES Row 134 recording time entered on 5/23/23 by Jonathan Forman, with narrative reading “Revise draft response focusing on introduction and legal section”; the narrative should be revised to read **“Revise draft response to Florida Office of Financial Regulation suspension order and administrative complaint focusing on introduction and legal section.”**

## II. CONCLUSION

WHEREFORE, for the reasons set forth herein, the Final Fee Application, and the supporting documents in connection with same, B&H respectfully requests (i) that the Court enter an order approving, on a final basis, the voluntarily reduced full amount of \$201,409.50 for all professional fees for services performed by B&H for or on behalf of Debtor in connection with this Chapter 11

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Case as well as expenses incurred in the sum of \$511.68, for a total of \$201,921.18 in Requested Compensation, and (ii) for such other and further relief as the Court may deem just and proper.

Dated this 25th day of September 2024.

**BAKER & HOSTETLER LLP**

By: /s/ Robert A. Musiala

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Respectfully submitted by:

**FOX ROTHSCHILD LLP**

By: /s/ Brett A. Axelrod

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